

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ALL PLAINTIFFS LISTED IN EXHIBIT "A"	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS
AND TESTIMONY OF CHRISTINA PRAMUDJI, MD**

Plaintiffs respectfully request that the Court preclude defense expert Christina Pramudji, M.D., from giving opinions on: (1) the adequacy of Defendants' product warnings and IFUs; (2) whether Defendants' transvaginal mesh products are defectively designed; (3) the safety and efficacy of Defendants' products based on her own practice; and (4) whether or not the polypropylene mesh in the mesh products degrades beyond what she has personally observed in her own practice. The basis for Plaintiffs' motion is more fully set out in the accompanying Memorandum.

Dated: April 21, 2016

Respectfully submitted,

/s/ Thomas P. Cartmell

Thomas P. Cartmell, Esq.

Jeffrey M. Kuntz, Esq.

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

Telephone: (816) 701-1100

Facsimile: (816) 531-2372

tcartmell@wcllp.com

jkuntz@wcllp.com

/s/ D. Renee Baggett

Bryan F. Aylstock, Esq.

Renee Baggett, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

Telephone: (850) 202-1010

Facsimile: (850) 916-7449

baylstock@awkolaw.com

rbaggett@awkolaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 21, 2016 using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

/s/Thomas P. Cartmell
Attorney for Plaintiffs

INDEX OF EXHIBITS

Exhibit A: List of cases on which Dr. Pramudji is designated

Exhibit B: Pramudji TVT & TVT-O Expert Report

Exhibit C: Gynemesh PS, Prolift & Prosmia Expert Report

Exhibit D: Pramudji March 24, 2016 Deposition

Exhibit E: Pramudji Sept. 17, 2014 Deposition

Exhibit F: Owens Sept. 12, 2012 Deposition

Exhibit G: Robinson March 14, 2012 Deposition

Exhibit H: O'Bryan May 18, 2012 Deposition

Exhibit I: Pramudji April 11, 2014 Deposition